

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**
(Greenbelt Division)

In re:	:	
	:	
CHRISTIE L. MORRIS,	:	Case No. 19-2-1714-TJC
	:	Chapter 13
Debtor.	:	
	:	

**TRUSTEE'S OBJECTION TO DEBTOR'S
CHAPTER 13 PLAN DATED OCTOBER 7, 2019**

Timothy P. Branigan, Chapter 13 trustee in the above-captioned case ("Trustee"), pursuant to section 1325 of the Bankruptcy Code and Bankruptcy Rule 3015(f) objects to confirmation of the Debtor's Chapter 13 plan dated October 7, 2019 (the "Plan"). In support of his opposition, the Trustee respectfully represents the following:

1. The Debtor commenced this case under Chapter 13 on August 31, 2019. The Plan proposes to pay \$398.00 monthly for 60 months for a gross funding of \$23,880.00.
2. The Plan must be amended to eliminate any obligation under section 3.5 and to select section 3.1.
3. The Trustee verified the Debtor's net monthly income to be \$5,901.56. The Plan fails to provide that all of the Debtor's projected disposable income will be applied to make payments to unsecured creditors under the Plan. The Plan does not satisfy the requirements of section 1325(b)(1)(B) of the Bankruptcy Code.
4. The Debtor has failed to provide bank statements as of the petition date as requested by the Trustee. At this time, the Debtor has failed to fully cooperate with the Trustee as required under section 521(a)(3) of the Bankruptcy Code.

5. The Debtor has not adequately proved ownership and the market value of scheduled real property. The Plan does not satisfy the requirements of section 1325(a)(4) of the Bankruptcy Code.

6. Accordingly, the Plan should not be confirmed.

PLEASE TAKE NOTICE THAT *THIS OBJECTION MUST BE RESOLVED AT LEAST 2 BUSINESS DAYS PRIOR TO THE CONFIRMATION HEARING.* AFTER THAT TIME, THE TRUSTEE MAY DECLINE TO ACCEPT MATERIALS THAT HE HAS REQUESTED FROM THE DEBTORS. THE TRUSTEE MAY DECLINE TO DISCUSS THE CASE AT THE CONFIRMATION HEARING. THE DEBTORS SHOULD EXPECT THAT ANY UNRESOLVED OBJECTION WILL BE HEARD BY THE COURT.

Respectfully submitted,

October 23, 2019

/s/ Timothy P. Branigan
Timothy P. Branigan (Fed. Bar No. 06295)
Chapter 13 Trustee
9891 Broken Land Parkway, #301
Columbia, Maryland 21046
(410) 290-9120

Certificate of Service

I hereby certify that the following persons are to be served electronically via the CM/ECF system:

Robert J. Harris, Esquire

I caused a copy of the pleading above to be sent on October 23, 2019 by first-class U.S. mail, postage prepaid to:

Christie L. Morris
13746 Palmetto Circle
Germantown, MD 20874

/s/ Timothy P. Branigan
Timothy P. Branigan (Fed. Bar No. 06295)